

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

ROBERT LEE LEWIS

Case No. 20-MJ-30532

Filed: 12/21/2020

SEALED MATTER (kcm)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 4, 2020 in the county of Genesee in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

21 U.S.C. § 922(g)(1)

Felon In Possession of a Firearm

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: December 21, 2020City and state: Flint, Michigan*Complainant's signature*DUSTIN HURT, Special Agent, ATF&E*Printed name and title**Judge's signature*CURTIS IVY, JR., U.S. Magistrate Judge*Printed name and title*

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

United States v. Robert Lee Lewis

1. I have been employed as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) since October of 2018. I am currently assigned to the Detroit Field Division, Flint Field Office. Before working for the ATF, I was employed by the Michigan Department of State Police (MSP) for approximately seven years. Before working for MSP, I was a local police officer for the Grand Ledge Police Department for approximately three years. I held numerous positions with the MSP, including Detective Sergeant in the Polygraph Unit and Task Force Officer with the FBI. During my employment with ATF and MSP, I have conducted or participated in numerous criminal investigations focused on firearms, armed drug trafficking, and criminal street gangs, and other violations of federal law.

2. I make this affidavit from personal knowledge based on my participation in this investigation, my review of reports and other materials prepared by those who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.

3. On October 4, 2020, Jessica Williams took her 12 year old daughter J.A.W-L. to visit her father, Robert Lewis at a residence in Flint Township, Michigan. At approximately 10:20 p.m., Jessica Williams arrived to pick up J.A.W-L., who was waiting outside the apartment. Robert Lewis exited the apartment with a gun in his hand. Lewis grabbed J.A.W-L and took her back inside the apartment. Jessica Williams then called and reported the incident to the police.

4. Jessica Williams described the firearm as being approximately 2 feet long, black in color with two barrels. Williams also reported that Lewis is a convicted felon.

5. Flint Township officers were dispatched to the apartment complex. After speaking with Williams, Flint Township officers Turvey and Ackerman approached the apartment and made contact with Lewis who was now standing outside. Lewis explained, he did not approve of J.A.W-L.'s home life with Williams and did not want her to return with her mother.

6. Lewis allowed officers to enter the apartment and gave consent to search for weapons. Lewis's mother, Wanda Lemons, was also in the apartment. A search was conducted and no weapon was located. Lewis agreed to release J.A.W-L to Williams and officers on scene assisted with the transfer.

7. As officers were leaving the scene, Williams,' boyfriend Quintell Donmonique-Dante Carter requested that officers speak with J.A.W-L., who was in the Williams' vehicle. J.A.W-L was crying but Williams advised that J.A.W-L. told her when Lewis dragged her back into the apartment he pointed a firearm at her. J.A.W-L was not specific with officers as to the whereabouts of the firearm but Williams advised them to check Lemons' vehicle described as a white SUV.

8. Flint Township Officers returned to the apartment and observed a white GMC Terrain bearing Michigan registration 9618J5. This vehicle was queried in LEIN which provided that the vehicle is registered to a Wanda Lemons. Officers did not see anything in plain view inside the vehicle.

9. Officers went back to the apartment and again asked Lewis to search the apartment. Lewis became upset made a call and then left the apartment complex in a silver Impala. Lemons advised that she owns the apartment and gave officers permission to search her bedroom and the back of the apartment. No weapon was found.

10. Sgt VanLente called Williams, who had left the scene and asked to speak with J.A.W-L. J.A.W-L. gave officers additional details over the phone. She told officers that Williams arrived to the apartment to pick her up Lewis exited the apartment with a firearm in his hand and dragged her back into the apartment by

her neck. She said that when they entered the apartment Lewis shut the door at which time she fell to the ground. While on the ground J.A.W-L Lewis pressed the barrel of the firearm to the side of her head and threatened to kill her and her mother. J.A.W-L advised that after Lewis lowered the firearm he walked to the end of the hall and placed the firearm inside a black bag. J.A.W-L added that Lewis then told Lemons to unlock her vehicle and walked outside. J.A.W-L told officers that she did not give officers this information on scene because she was scared of Lewis.

11. J.A.W-L. described the firearm as being about 4 times the length of her shoe, that is was brown and black in color and had a long “clip” in it.

12. Sgt VanLente and Officer Ackerman again made contact with Lemons. At this time Lewis’s ex-girlfriend Arealle Pea was at the apartment. Officers asked Lemons for consent to search her vehicle. Lemons did not give consent and told officers she did not understand why they wanted to search her vehicle. Pea asked to speak with officers outside the apartment. After a brief conversation Pea went back inside the apartment.

13. After approximately 5 minutes officers knocked on the apartment door. Lemons invited the officers back in the apartment and they again asked Lemons for consent to search her vehicle. Lemons told Pea to unlock the car and Lemons gave consent to search the vehicle.

14. Sgt VanLente looked in the hatch of the vehicle and raised the cover for the spare tire locating a black draw string bag resting on top of the spare tire. Inside the black bag was a brown and black AR-15 pistol with two loaded magazines

15. The firearm was a brown and black American Tactical Imports 5.56 AR-15 pistol bearing S/N: NS181935. The firearm was queried in LEIN which provided it was reported stolen out of Mount Morris Township. Both magazines seized were loaded. One 30-round magazine was loaded with 30 rounds of .223 ammunition and a 40-round magazine was loaded with 14 rounds of .223 ammunition.

16. I queried Robert lee Lewis's criminal history in LEIN which provided the following:

-November 9, 2009 – Lewis pled guilty to Unarmed Robbery and Carrying a Concealed Weapon in the 7th Circuit Court of Michigan. Lewis was sentenced to the custody of the Michigan Department of Correction for a term of imprisonment of 20 to 30 months.

-December 10, 2018 – Lewis pled guilty to Carrying a Concealed Weapon, Felon in Possession of a Firearm, and Assault with a Dangerous Weapon in the 7th Circuit Court of Michigan.

17. I have spoken with ATF Special Agent Jonathan Wickwire, who is recognized by ATF as having expertise in the interstate travel and manufacture of firearms. SA Wickwire advised that the American Tactical Imports 5.56 AR-15 pistol bearing S/N: NS181935 was manufactured outside of the state of Michigan

and is a firearm as defined in Chapter 44, Title 18, United States Code.

18. Based on the foregoing, I have probable cause to believe that on October 4, 2020, in the Eastern District of Michigan, Robert Lee Lewis, knowing that he had been convicted of multiple felony offenses punishable by a term of imprisonment exceeding one year, knowingly possessed, in and affecting commerce, a firearm, in violation of 18 U.S.C. § 922(g)(1).



DUSTIN HURT, Affiant
Special Agent
Bureau of Alcohol, Tobacco, Firearms & Explosives

Sworn to before me and signed in my presence and/or by reliable electronic means
on December 21, 2020.



HON. CURTIS IVY, JR.
United States Magistrate Judge